

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: Carmelita P. Zarola,	:	Chapter 13 Bankruptcy
	:	
Debtor	:	CASE NO. 5-19-01677
	:	
Toyota Motor Credit Corporation,	:	
	:	
Movant	:	11 U.S.C. §362
	:	
vs.	:	
	:	
Carmelita P. Zarola and Charles J. DeHart,	:	
III, Esquire,	:	
	:	
Respondents	:	

ANSWER TO
MOTION OF TOYOTA MOTOR CREDIT CORPORATION
FOR RELIEF FROM STAY

The Debtor, by and through her counsel, Kevin M. Walsh, Esquire, answers the Motion for Relief from Stay regarding a 2017 Toyota Camry, as follows:

1-14. The 2017 Toyota lease agreement was paid and the motor vehicle has been returned.

WHEREFORE, Debtor objects to the relief being requested.

Debtor does not oppose relief being granted, if Movant needs relief, to take possession of the 2017 Camry.

/s/Kevin M. Walsh

Kevin M. Walsh, Esquire
Attorney I.D. No. 35209
Attorney for Debtor
297-299 Pierce Street
Kingston, PA 18704
(570) 283-3041

CERTIFICATE OF SERVICE

I, Kevin M. Walsh, Esquire, certify that a true and correct copy of the foregoing was forwarded to the below named on the 8th day of September, 2020, as follows:

**Charles J. DeHart, III, Esquire
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036**

- **By Clerk's Notice of Electronic Filing**

**Fred W. Freitag, IV, Esquire
Leopold & Associates, PLLC
80 Business Park Drive
Suite 110
Armonk, NY 10504**

- **By Clerk's Notice of Electronic Filing**

**Carmelita P. Zarola
130 Waller Street
Wilkes-Barre, PA 18702**

- **By U.S. First Class Mail, Postage Prepaid**

/s/Kevin M. Walsh

Kevin M. Walsh, Esquire
Attorney I.D. No. 35209
Attorney for Debtor
297-299 Pierce Street
Kingston, PA 18704
(570) 283-3041